

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC
INFORMATION PRIVACY LITIGATION

This Document Relates To:

ALL ACTIONS.

) Master File No. 3:15-cv-03747-JD
)
) [PROPOSED] ORDER GRANTING
) PLAINTIFFS' ADMINISTRATIVE
) MOTION TO FILE DOCUMENTS UNDER
) SEAL PURSUANT TO CIVIL LOCAL
) RULES 7-11 AND 79-5
)
)
)

Before the Court is Plaintiffs' Administrative Motion to File Documents Under Seal Pursuant to Local Rules 7-11 and 79-5.

IT IS HEREBY ORDERED that Plaintiffs' Administrative Motion to File Documents Under Seal Pursuant to Local Rules 7-11 and 79-5 is **GRANTED** to the following extent.

The following documents shall be sealed:

Document	Reason
FBBIPA_00001123-FBBIPA_00001125	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
Excerpts from the transcript of the October 26, 2017, deposition of Omry Yadan	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00005371-FBBIPA_00005373	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
Excerpts from the transcript of the October 18, 2016, deposition of Yaniv Taigman	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
Excerpts from the transcript of the September 19, 2017, deposition of Robert Sherman	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00009297-FBBIPA_0009298	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00034064	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00036832-FBBIPA_00036833	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00028668	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00003858-FBBIPA_00003859	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00039597-FBBIPA_00039608	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00000930-FBBIPA_00000939	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00000870-FBBIPA_00000884	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
FBBIPA_00000885-FBBIPA_0000899	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)

1	FBBIPA_00000900-FBBIPA_00000914	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
2	FBBIPA_00008243	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
3		
4	Excerpts from Defendant's Amended and Supplemental Response to Plaintiffs' Second Set of Interrogatories	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
5		
6	FBBIPA_00000295-FBBIPA_00000327	Designated Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
7	FBBIPA_00000751-FBBIPA_00000753	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
8		
9	FBBIPA_00008876-FBBIPA_00008877	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
10		
11	FBBIPA_00038236-FBBIPA_00038249	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
12		
13	FBBIPA_00030648	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
14		
15	FBBIPA_00003483	Designated Highly Confidential by Defendant Pursuant to the Stipulated Protective Order (Dkts. 87, 88)
16		
17	Further, the following redactions shall be withheld from the public record:	
18	Redaction	Reason
19	Page 1, lines 11 through 16	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
20		
21	Page 2, lines 26 through 28	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
22		
23	Page 3, lines 1 through 28	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
24		
25	Page 4, lines 1 through 10	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
26		
27		
28	Page 4, lines 13 through 23	References, quotes, or cites material designated Confidential or Highly Confidential by

1		Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
2	Page 6, line 25	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
3		
4	Page 7, lines 1 through 2	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
5		
6		
7	Page 7, lines 11 through 25	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
8		
9	Page 9, lines 2 through 4	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
10		
11	Page 9, lines 10 through 28	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
12		
13		
14	Page 10, line 1	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
15		
16	Page 11, lines 12 through 18	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
17		
18		
19	Page 14, lines 10 through 12	References, quotes, or cites material designated Confidential or Highly Confidential by Defendant pursuant to the Stipulated Protective Order (Dkts. 87, 88)
20		

DATED: _____

HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE

1 Submitted by: s/ Rafey Balabanian

2 DATED: December 8, 2017

3 EDELSON PC
4 JAY EDELSON*
5 ALEXANDER G. TIEVSKY*
6 350 North LaSalle Street, Suite 1300
7 Chicago, IL 60654
8 Telephone: 312/589-6370
9 312/589-6378 (fax)

10 EDELSON PC
11 RAFEY BALABANIAN
12 123 Townsend Street, Suite 100
13 San Francisco, CA 94107

14 LABATON SUCHAROW LLP
15 JOEL H. BERNSTEIN*
16 CORBAN S. RHODES*
17 ROSS M. KAMHI*
18 140 Broadway
19 New York, NY 10005
20 Telephone: 212/907-0700
21 212/818-0477 (fax)

22 ROBBINS GELLER RUDMAN
23 & DOWD LLP
24 SHAWN A. WILLIAMS
25 DAVID W. HALL
26 Post Montgomery Center
27 One Montgomery Street, Suite 1800
28 San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
PAUL J. GELLER*
STUART A. DAVIDSON*
MARK DEARMAN*
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

1 ROBBINS GELLER RUDMAN
2 & DOWD LLP
3 TRAVIS E. DOWNS III
4 655 West Broadway, Suite 1900
5 San Diego, CA 92101
6 Telephone: 619/231-1058
7 619/231-7423 (fax)

8 Attorneys for Plaintiffs

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
* = Admitted *pro hac vice*